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November 12, 2019

**BY ECF**

Honorable Stewart D. Aaron  
United States District Magistrate Judge  
Southern District of New York  
500 Pearl Street, Room 703  
New York, New York 10007

Re: Local 1180, et al. v. City of New York et al.  
Civil Action Number: 17 CV 3048

Dear Magistrate Judge Aaron:

Pursuant to Your Honor's November 9, 2019 Order, I write to address (1) the status of payments to the Claims Administrator, and the service award payments to Beltran and Reed; (2) the status of providing level payment and salary information to the union; and (3) whether Defendants will accept Plaintiffs' offer to have one Back Pay pay-out to all Settlement Class Members on or before December 23, 2019 provided they have submitted settlement paperwork by the December 1, 2019 cut-off date to register a claim in this matter, and legal fees by January 6, 2019. *See* Dkt. #167. I address each one separately below.

1. Payments to the Claims Administrator and Service Award Payments

On October 30, 2019, a check for \$20,000.00 was issued to RG2 Claims Administration, LLC.

On November 1, 2019, a service award check for \$1000.00 was issued to Lynette Andrews.

On November 4, 2019, service award checks for \$1000.00 were issued to Lourdes Acevedo and Rose Reeves.

Proof of payments listed above can be found at Exhibit "1."

Pursuant to the Court's November 1, 2019 Order regarding electronic signatures, the Office of the Comptroller is currently processing the \$1000.00 service award payments to Nathia Beltran and Adrienne Reed. *See* Dkt. # 164.

2. Level Payment and Salary Information

With respect to level payment and salary information, Daniel Pollack at the Office of Labor Relations has informed this office that he has been communicating regularly with Local 1180's President, Gloria Middleton, regarding level placement. According to Mr. Pollack, the latest excel spreadsheet shared with Ms. Middleton on November 7, 2019, is incomplete by less than 50 Administrative Managers, NM employed by the Department of Education ("DOE") and the Teacher's Retirement System ("TRS"). Mr. Pollack has indicated that he expects to hear from these two agencies regarding level placement within the next week.

3. Plaintiffs' Most Recent Offer to Defendants Regarding Settlement Payments

Plaintiffs' most recent offer to have one Back Pay pay-out to all Settlement Class Members on or before December 23, 2019—provided they have submitted settlement paperwork by the December 1, 2019 cut-off date to register a claim in this matter—and legal fees by January 6, 2019, was presented to Defendants' counsel late in evening on Thursday, November 7, 2019. Due to the fact that the undersigned was out of the office last week, and government offices were closed on Monday for Veterans' Day, there has been no opportunity to meet and confer with Plaintiffs' counsel on specific issues related to the newest pay proposal in order for Defendants to fully consider the offer internally. As such, Defendants request to the end of the week to advise the Court on whether Defendants accept Plaintiffs' most recent offer.

Respectfully submitted,

**ECF /s/**

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cc: The Kurland Group (by ECF)

ENDORSEMENT: Service award payments to Nathia Beltran and Adrienne Reed shall be completed immediately. Such payments are past due. (See 9/25/2019 Order, ECF No. 153 ("No later than November 6, 2019, a \$1,000.00 service award payment shall be made to each of Acevedo, Andrews, Beltran, Reed and Reeves.")) Defendants' request in paragraph 3 above for an extension of time is GRANTED. Defendants shall respond to Plaintiffs' offer no later than Friday, 11/15/2019. SO ORDERED.

Dated: 11/13/2019

